

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

George D. McCarley  
Plaintiff

v.

Household Finance Corporation III  
Defendant

Civil Action No. 3:06-CV-0091-MEF  
Lead Case<sup>1</sup>

RECEI

2007 OCT 10

DEBRA P. HACKB  
U.S. DISTRICT J  
MIDDLE DISTRICT

PLAINTIFF RESPONSE TO ORDER OF DOC. # 80-1.

Plaintiff was ordered to file an amended Motion to Compel Discovery, by October 10, 2007. Specifically, plaintiff is ordered to "provide a short statement concisely listing the interrogatory number which remains unanswered."

Plaintiff contends none of the responses provided meet the true spirit of discovery intended by "the rules." Plaintiff provides the following concise list of questions that are:

Seriously Incomplete

4. (III)(ii)
4. (IV)
- 5.
6. (a),(b),(c),(d),(e),(f),(g)
- 7.
- 9.
- 10.
11. (a),(b),(c),(d),(e)
- 13.
- 14.
15. (a),(b),(c)
16. (a),(b),(c),(d),(e),(f),(g)
- 17.
18. (a),(b)
- 19.
- 20.
- 22.
- 24.
- 25.

Not Responded At All

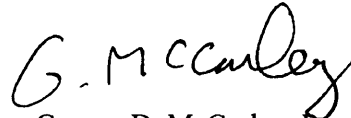
26. 45.
- 27.
- 28.
- 29.
- 30.
- 31.
- 32.
- 33.
- 34.
- 35.
- 36.
- 37.
- 38.
- 39.
- 40.
- 41.
- 42.
- 43.
- 44.

<sup>1</sup> 3:06 cv 00091 (lead case) includes Household Finance Corporation, III (00093), HSBC-Gr. Corp. (00102), HSBC Mortgage Services, Inc. (00104), HSBC Finance Corporation (00101), and, Household International, Inc. (00103).

This is the result after one (1) round of Interrogatory. In the Rule 26(f) scheduling meeting of March 23, 2007, Judge Capel ordered 25 questions and four (4) rounds of exchange. In the event McCarley has not counted the questions or rounds correctly, then McCarley would be happy to re-number or to vary the content of the rounds. However, these are very basic interrogatory questions most strongly related to the subject matter of the case.

We thank the court for the "Order to Compel.

Respectfully submitted

  
George D. McCarley, Pro Se  
216B Chestnut Street  
Roanoke, Al 36274  
334-863-6489

#### PROOF OF SERVICE

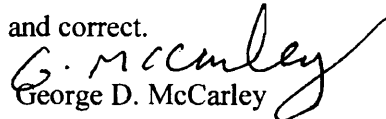
I, George D. McCarley, do swear or affirm that on October 9, 2007, I have served the enclosed ACTION on each party to the above or that party's counsel, and on every other person required to be served, by depositing envelope containing the above documents in the United States Mail properly addressed, and with first class postage prepaid, for delivery within 3 calendar days.

The Clerk  
Middle District of Alabama, Eastern Division  
One Church Street, PO Box 711  
Montgomery, Al 36101-0711  
334-954-3600

Defendant Attorney  
Mr. George Parker  
Bradley Arant Rose and White  
Alabama Center for Commerce  
401 Adams Avenue, Suite 780  
Montgomery, Al 36104  
334-956-7671, 956-7700

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 9, 2007

  
George D. McCarley